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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CAROLYN WALKER,

Plaintiff

v.

CAROLYN W. COLVIN, Acting Commissioner
of Social Security,

Defendant.

Civil No. 3:15-cv-05369 WHO

**EX PARTE MOTION TO EXTEND
TIME FOR DEFENDANT TO FILE
HER COUNTER-MOTION FOR
SUMMARY JUDGMENT**

Defendant Carolyn W. Colvin, Acting Commissioner of Social Security, requests to extend the time by two weeks, from April 25, 2016 to May 9, 2016 for the Commissioner to provide her Counter-Motion For Summary Judgment, with all other dates in this Court's Procedural Order For Social Security Review Actions extended accordingly. This is the Commissioner's first request for an extension. The request is being made ex parte because counsel for the Defendant was unable to reach Plaintiff's counsel via telephone or email in the hope of filing a stipulated motion.

Counsel makes this request in good faith. There is good cause for this request because the case was recently reassigned to new counsel for Defendant, who needs additional time to become familiar with the facts and the issues presented in the opening brief, as well as a quality review of the brief in accordance with our office procedures. There is also good cause for this extension because the undersigned counsel is currently responsible for dozens of district court cases at various stages of litigation, a Ninth Circuit Privacy Act case which is going to hearing on May 4, 2016, dozens of subpoena and disclosure matters, two representative sanction matters, as well as a Federal Tort Claim Act and other miscellaneous litigation cases in district court with current filing deadlines. As a result, the Commissioner needs additional time to properly address the issues raised in Plaintiff's Motion For Summary Judgment.

Respectfully submitted,

Date: April 22, 2016

BRIAN STRETCH
United States Attorney

By: /s/ Patrick William Snyder
PATRICK WILLIAM SNYDER
Special Assistant United States Attorney


Of Counsel, JAMES BIELENBERG

Attorneys for Defendant

ORDER

IT IS ORDERED that the Commissioner shall have until May 9, 2016 to file her Counter-Motion For Summary Judgment, with all other dates in this Court's Procedural Order For Social Security Review Actions extended accordingly.

Date: April 25, 2016



THE HONORABLE WILLIAM H. ORRICK
United States District Judge